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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICOH COMPANY LTD.,	)	
	)	Case No.: C-03-4669-MJJ (EMC)
Plaintiff,	)	
	)	
vs.	)	<b>RICOH'S REPLY TO AMENDED</b>
	)	<b>ANSWER AND COUNTERCLAIMS OF</b>
AEROFLEX INCORPORATED, ET AL.	)	<b>DEFENDANT MATROX TECH, INC. TO</b>
	)	<b>AMENDED COMPLAINT FOR PATENT</b>
Defendants	)	<b>INFRINGEMENT</b>

Plaintiff Ricoh Company, Ltd. ("Rico") for its Reply to the Answer and Counterclaims of Defendant Matrox Tech, Inc. To Amended Complaint For Patent Infringement (hereinafter "Answer and Counterclaim of Matrox Tech"), alleges as follows:

1           1.       Paragraphs 1-67 of the Answer and Counterclaim of Matrox Tech do not require a  
2 response; nevertheless and to the extent necessary, Plaintiff Ricoh asserts all defenses and  
3 affirmation defenses available to it, including but not limited to failure to state a claim upon  
4 which relief can be granted and lack of subject matter jurisdiction.

5           2.       Plaintiff Ricoh admits the allegations of paragraph 68 of the Answer and  
6 Counterclaim of Matrox Tech.

7           3.       Plaintiff Ricoh admits the allegations of paragraph 69 of the Answer and  
8 Counterclaim of Matrox Tech.

9           4.       With respect to paragraph 70 of the Answer and Counterclaim of Matrox Tech,  
10 Ricoh admits there is a justicable controversy insofar as the counterclaims relate to claims 13-17  
11 of the '432 Patent but denies there is a justicable controversy to the extent any of the  
12 counterclaims relate to any of the other claims of the '432 Patent and further states that the Court  
13 lacks jurisdiction with respect to such counterclaims.

14          5.       Plaintiff Ricoh admits this Court has personal jurisdiction over Ricoh and  
15 otherwise denies the allegations of paragraph 71 of the Answer and Counterclaim of Matrox  
16 Tech.

17          6.       Plaintiff Ricoh admits venue is proper in this district and otherwise denies the  
18 allegations of paragraph 72 of the Answer and Counterclaim of Matrox Tech.

19          7.       Plaintiff Ricoh admits the allegations of paragraph 73 of the Answer and  
20 Counterclaim of Matrox Tech insofar as they relate to claims 13-17 of the '432 Patent but denies  
21 there is a justicable controversy as to any of the other claims of the '432 Patent and the Court  
22 therefore lacks jurisdiction with respect to such other claims.

23          8.       In response to paragraph 74 of the Answer and Counterclaim of Matrox Tech,  
24 Plaintiff Ricoh incorporates its responses to paragraph 68-73 of the Answer and Counterclaim of  
25 Matrox Tech as if fully set forth herein, denies the allegations in paragraphs 58-67 of the Answer  
26 and Counterclaim of Matrox Tech; and notes there are no allegations requiring response in  
27 paragraph 1-57 of the Answer and Counterclaim of Matrox Tech but nevertheless and to the  
28

1 extent necessary, admits or denies or denies information and belief sufficient to form a belief, as  
2 appropriate, as to any statements therein.

3 9. Plaintiff Ricoh admits the allegations of paragraph 75 of the Answer and  
4 Counterclaim of Matrox Tech, but alleges that it is the owner of the '432 Patent.

5 10. Plaintiff Ricoh admits the allegations of paragraph 76 of the Answer and  
6 Counterclaim of Matrox Tech.

7 11. Plaintiff Ricoh denies the allegations of paragraph 77 of the Answer and  
8 Counterclaim of Matrox Tech.

9 12. Paragraph 78 of the Answer and Counterclaim of Matrox Tech is not a proper  
10 allegation but rather is a prayer for relief; nevertheless and to the extent necessary, plaintiff  
11 Ricoh denies the allegations of paragraph 78 of the Answer and Counterclaim of Matrox Tech.

12 13. In response to paragraph 79 of the Answer and Counterclaim of Matrox Tech,  
13 Plaintiff Ricoh incorporates its responses to paragraph 68-78 of the Answer and Counterclaim of  
14 Matrox Tech as if fully set forth herein, denies the allegations in paragraphs 58-66 of the Answer  
15 and Counterclaim of Matrox Tech; and notes there are no allegations requiring response in  
16 paragraph 1-57 of the Answer and Counterclaim of Matrox Tech but nevertheless and to the  
17 extent necessary, admits or denies or denies information and belief sufficient to form a belief, as  
18 appropriate, as to any statements therein.

19 14. Plaintiff Ricoh denies the allegations of paragraph 80 of the Answer and  
20 Counterclaim of Matrox Tech.

21 15. Paragraph 81 of the Answer and Counterclaim of Matrox Tech is not a proper  
22 allegation but rather is a prayer for relief; nevertheless and to the extent necessary, plaintiff  
23 Ricoh denies the allegations of paragraph 80 of the Answer and Counterclaim of Matrox Tech.

24 16. Paragraph 82 of the Answer and Counterclaim of Matrox Tech is not a proper  
25 allegation and is not permitted under the Federal Rules of Civil Procedure and therefore does not  
26 require a response; nevertheless and to the extent necessary, plaintiff Ricoh denies the  
27 allegations of paragraph 82 of the Answer and Counterclaim of Matrox Tech.  
28

**PRAYER FOR RELIEF**

WHEREFORE, Ricoh prays for entry of judgment:

that Matrox Tech has infringed the '432 Patent;

that Matrox Tech, its agents, employees, representatives, successors, and assigns and those acting, or purporting to act, in privity or in concert with Matrox Tech, be preliminarily and permanently enjoined from further infringement of the '432 Patent;

that Matrox Tech account for and pay to Ricoh all damages under 35 U.S.C. § 284, including enhanced damages, caused by the infringement of the '432 Patent, and attorneys' fees pursuant to 35 U.S.C. § 285;

that Ricoh be granted pre-judgment and post-judgment interest on the damages caused to it by reason of Matrox Tech's infringement of the '432 Patent;

that Matrox Tech's Counterclaim be dismissed with prejudice;

that costs be awarded to Ricoh; and

1           that Ricoh be granted such other and further relief as the Court may deem just and proper  
2 under the current circumstances.

3  
4 Dated: May 2, 2006

Respectfully submitted,  
Ricoh Company, Ltd.

5  
6 By: /s/ Kenneth Brothers

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